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 and Vi Healthcare Finance, Inc.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

In re:
 SOUTHERN INYO HEALTHCARE
 DISTRICT,
 Chapter 9 Debtor.

SOUTHERN INYO HEALTHCARE
 DISTRICT,
 Plaintiff,
 v.
 HEALTHCARE CONGLOMERATE
 ASSOCIATES, LLC; VI HEALTHCARE
 FINANCE, INC.; and DOES 1 through 10,
 Defendants.

Case No.: 16-10015-A-9

Chapter 9

Adv. Case No.: 18-01031-A

DCN: JSS-01

Hearing

Date: May 1, 2019

Time: 2:00 p.m.

Place: 5th Fl. Ct. Rm. 11

United States Bankruptcy Court
 2500 Tulare Street
 Fresno, CA

Judge: Honorable Fredrick E. Clement

**STIPULATION TO FURTHER CONTINUE STATUS CONFERENCE AND HEARING
 ON MOTION FOR PRELIMINARY INJUNCTION AGAINST VI HEALTHCARE
 FINANCE, INC., FOR SEQUESTRATION OF TAX REVENUES PENDING FINAL
 RULING ON THE MERITS OF THIS ADVERSARY CASE OR FURTHER ORDER OF
THIS COURT**

1 IT IS HEREBY STIPULATED AND AGREED by and between VI Healthcare Finance,
2 Inc. ("Defendant") and Southern Inyo Healthcare District ("Plaintiff"), by counsel, as follows:

3 1. On November 1, 2018, the Plaintiff filed a *Motion for Preliminary Injunction*
4 *Against VI Healthcare Finance, Inc., For Sequestration of Tax Revenues Pending Final Ruling On*
5 *The Merits Of This Adversary Case Or Further Order Of This Court* (the "Motion") [Dkt. No. 29].

6 2. The hearing on the Motion was originally scheduled to take place on November 29,
7 2018 at 2:00 p.m.

8 3. On November 9, 2018, parties stipulated [Dkt. No. 39], and the court made its
9 order approving the stipulation [Dkt. No. 43], to continue the hearing date and time to December
10 19, 2018, at 2:00 p.m.

11 4. On December 7, 2018, the Court made its order approving the parties Stipulation
12 to Further Continue the Hearing with modifications from December 19, 2018 to January 23, 2019
13 at 2:00 p.m. [Dkt. No. 47].

14 5. On January 2, 2109, the parties stipulated [Dkt. No. 57] to further continue the
15 hearing date and time on the Motion to April 24, 2019 [Dkt. No. 57].

16 6. However, the Court made its *Order Continuing Status Conference and Order*
17 *Approving Stipulation to Further Continue Hearing on Motion for Preliminary Injunction against*
18 *Vi Healthcare Finance, Inc., for Sequestration of Tax Revenues Pending Final Ruling on the*
19 *Merits of this Adversary Case or Further Order of this Court*, which continued hearing on the
20 Motion to May 1, 2019 at 2:00 p.m. and also continued the Status Conference in the adversary
21 proceeding to May 1, 2019 at 2:00 p.m. [Dkt. No. 59].

22 7. Defendant and Plaintiff believe it would be mutually beneficial to continue the
23 hearing again on the Motion from May 1, 2019, at 2:00 p.m. to June 26, 2019, at 2:00 p.m.

24 8. Defendant and Plaintiff agree to continue the hearing on the Motion to June 26,
25 2019, at 2:00 p.m., provided that the Inyo County tax revenues at issue in the Motion (the "Tax
26 Revenues") are protected from distribution to any party pending a determination on the Motion
27 by the Court on June 26, 2019;

28 9. Plaintiff may further supplement the Motion on or before June 5, 2019.

1 Defendant's opposition to the Motion shall be served and filed no later than June 12, 2019, and
2 any reply to the opposition shall be served and filed no later than June 19, 2019.

3 10. Plaintiff and Defendant agree that pending a determination on the Motion at the
4 hearing on June 26, 2019 at 2:00 p.m., the Tax Revenues shall not be disbursed to either party and
5 if any disbursement is inadvertently made, any and all Tax Revenues received shall be held and
6 sequestered pending this Court's determination of the Motion.

7 11. This stipulation is without prejudice to the Defendant's right to oppose the Motion
8 or otherwise oppose the adversary proceeding on the merits.

9 12. The Status Conference in this proceeding, currently scheduled for May 1, 2019, at
10 2:00 p.m. shall also be continued to June 26, 2019, at 2:00 p.m. and the parties will file a joint
11 status report no later than 7 days prior to the continued hearing.

12 13. The parties stipulate and agree to entry of an order approving this Stipulation.

13
14 Dated: 4/1, 2019
15 *HOB*

KLEIN, DENATALE, GOLDNER, COOPER,
ROSENLIB & KIMBALL LLP

16 By: *[Signature]*

HAGOP T. BEDOYAN, Attorneys for Vi
Healthcare Finance, Inc.

17
18 Dated: March 31, 2019

JEFFREY S. SHINBROT, APLC

19
20 By: *[Signature]*

JEFFREY S. SHINBROT, Special
Litigation Counsel for Southern Inyo
Healthcare District